

**ERIN BULL, KATHRYN COLBERT,
TAMIKA DAVIS, MISSAES
DESJARDINS, EMILY GUGLIEMELLI,
TRISTA HUBBARD, CANDICE
JACQUES, REZ'HANA MADDOX,
SHERAY OMINYI, CANDACE PEGUES,
BRANDI TAPIA, and THE
CONTRIBUTOR, INC., a Tennessee-based
non-profit corporation,**

V.

Defendant.

Chief Judge William Campbell
Magistrate Judge Jeffery Frensley

Plaintiffs moved for a preliminary injunction and class certification on January 24, 2025. (Dkts. 23, 24.) Commissioner Carter's responses to those motions are due on March 20, 2025, and the parties are currently engaged in expedited discovery with fully booked schedules through March

10, 2025. (Dkts. 29, 30.) The parties previously stipulated to a deposition schedule that would require Ms. Tapia to sit for a deposition in the Tennessee Justice Center headquarters in Nashville on March 5, 2025. Because Ms. Tapia is incarcerated, that is no longer possible. Plaintiffs assured Commissioner Carter on March 4, 2025, that they have arranged with the Davidson County Sheriff's Office for Ms. Tapia to sit for deposition at the Metro Nashville-Davidson County Correctional Development Center-Female located at 5115 Harding Pike in Nashville, Tennessee at 9:00 a.m. on March 5, 2025.

Because Fed. R. Civ. P. 30(a)(2)(B) requires parties to obtain leave of Court before taking the deposition of an incarcerated person, Commissioner Carter asks the Court to rule on this motion on an expedited basis and grant leave before March 5, 2025, so there is time to take this deposition.

Plaintiffs do not oppose this motion.

For these reasons, this motion should be granted.

Respectfully submitted,

JONATHAN SKRMETTI
Attorney General and Reporter

s/ Miranda Jones
MIRANDA JONES (#36070)
Senior Assistant Attorney General
Law Enforcement and
Special Prosecutions Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Off. (615) 521-0417
Fax (615) 532-3926
Miranda.Jones@ag.tn.gov
Counsel for Defendant Carter

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was served by operation of the Court's ECF/PACER system on this the 4th day of March 2025, upon:

TENNESSEE JUSTICE CENTER

Michele Johnson,
Gordon Bonnyman, Jr.
Brant Harrell,
TENNESSEE JUSTICE CENTER
155 Lafayette Street
Nashville, TN 37210
Phone: (615) 255-0331
Fax: (615) 255-0354
mjohnson@tnjustice.org
gbonnyman@tnjustice.org
bharrell@tnjustice.org

DLA PIPER (US)

Whitney C. Cloud,*
One Liberty Place
1650 Market Street, Suite 5000
Philadelphia, PA 19103
Phone: (215) 656-3300
Email: whtney.cloud@us.dlapiper.com

Connor Rowinski,*
1251 Avenue of the Americas, 27th Floor
New York, NY 10020-1104
Phone: (212) 335-4500
Email: connor.rowinski@us.dlapiper.com

Allexandria V. Bingham,*
2000 Avenue of the Stars
Suite 400, North Tower
Los Angeles, CA 90067-4735
Phone: (310) 595-3000
Email: allexandria.bingham@us.dlapiper.com

HOGAN LOVELLS (US)

E. Desmond Hogan,*
Jennifer Fleury,*
Melissa Giangrande Jacobs,*
Fleming Farrell,*
Katherine Valde,*
Soojin Jeong,*
Devin Urness
HOGAN LOVELLS US LLP
555 Thirteenth Street, NW
Washington, DC 20004
Telephone: (202) 637-5600
Facsimile: (202) 637-5910
desmond.hogan@hoganlovells.com
jennifer.fleury@hoganlovells.com
melissa.giangrande@hoganlovells.com
flaming.farrell@hoganlovells.com
katherine.valde@hoganlovells.com
soojin.jeong@hoganlovells.com
devin.urness@hoganlovells.com

MAZON

Sarah Pratter,*
Director of Legal Advocacy
MAZON, Inc.
15303 Ventura Blvd, Ste 1100
Sherman Oaks, CA 91403-6621
Phone: (310) 442-0020
Facsimile: (310) 442-0030
spratter@mazon.org

*Admitted *Pro Hac Vice*

s/ Miranda Jones
MIRANDA JONES
Senior Assistant Attorney General